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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Latoya Danielle Gibson;)	No.
)	
Plaintiff,)	
)	
v.)	COMPLAINT
)	
CoreLogic Credco, LLC;)	
)	
Defendant.)	JURY TRIAL DEMANDED
)	
)	

PRELIMINARY STATEMENT

1. This is an action for damages brought by an individual consumer, Latoya Danielle Gibson, against Defendant CoreLogic Credco, LLC, for violations of the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. §§ 1681, *et seq.*

JURISDICTION AND VENUE

2. Jurisdiction of this Court arises under 15 U.S.C. § 1681p and 28 U.S.C. § 1331.
3. Venue lies properly in this district pursuant to 28 U.S.C. § 1391(b).

PARTIES

4. Plaintiff Latoya Danielle Gibson is an adult individual residing in Phoenix, AZ.

5. Defendant, CoreLogic Credco, LLC (“Credco”) is a consumer reporting agency (“CRA”) and a reseller of credit information that regularly conducts business in the District of Arizona, and which has a principal place of business located at 40 Pacifica Avenue, Suite 900, Irvine, CA 92618.

FACTUAL ALLEGATIONS

6. Defendant has been reporting derogatory and inaccurate statements about Plaintiff and Plaintiff’s purported criminal history to third parties (hereafter “inaccurate information”) since March 2019.

7. The inaccurate information includes, but is not limited to, two misdemeanor charges for criminal mischief and petit theft, which do not belong to Plaintiff. Defendant, however, has been inaccurately reporting this criminal history as relating to Plaintiff on her consumer reports.

8. The inaccurate information consists of criminal history and personal information that does not belong to the Plaintiff, and that actually belongs to another consumer. Due to Defendant’s faulty procedures, Defendant mixed the credit file of Plaintiff with that of at least one other consumer with respect to the inaccurate information and other personal identifying information.

9. Defendant has been reporting the inaccurate information through the issuance of false and inaccurate consumer reports that it has disseminated and resold to various persons, both known and unknown.

10. In or around March 2019, Plaintiff applied for and was denied an apartment rental with Progress Residential. Defendant sold an inaccurate report to this third party about the Plaintiff.

11. The basis for this denial was the inaccurate information that appears on Plaintiff's consumer report prepared by the Defendant, which was a substantial factor for the denial.

12. As a result of Defendant's conduct, Plaintiff has suffered actual damages in the form of lost rental opportunities, harm to reputation, and emotional distress, including humiliation and embarrassment.

13. At all times pertinent hereto, the Defendant was acting by and through its agents, servants and/or employees who were acting within the course and scope of their agency or employment, and under the direct supervision and control of the Defendant herein.

14. At all times pertinent hereto, the conduct of the Defendant, as well as that of its agents, servants and/or employees, was malicious, intentional, willful, reckless, and in grossly negligent disregard for federal and state laws and the rights of the Plaintiff herein.

COUNT I - CREDCO
VIOLATIONS OF THE FCRA

15. Plaintiff incorporates the foregoing paragraphs as though the same were set forth at length herein.

16. At all times pertinent hereto, the Defendant was a "person" and "consumer reporting agency" as those terms are defined by 15 U.S.C. § 1681a(b) and (f).

17. At all times pertinent hereto, Plaintiff was a "consumer" as that term is defined by 15 U.S.C. § 1681a(c).

18. At all times pertinent hereto, the above-mentioned credit reports were "consumer reports" as that term is defined by 15 U.S.C. § 1681a(d).

19. Pursuant to 15 U.S.C. § 1681n and 15 U.S.C. § 1681o, Defendant is liable to the Plaintiff for willfully and negligently failing to comply with the requirements imposed on a consumer reporting agency of information pursuant to 15 U.S.C. §1681e(b).

20. The conduct of Defendant was a direct and proximate cause, as well as a substantial factor, in bringing about the serious injuries, actual damages and harm to Plaintiff that are outlined more fully above and, as a result, the Defendant is liable to Plaintiff for the full amount of statutory, actual and punitive damages, along with the attorneys' fees and the costs of litigation.

JURY TRIAL DEMAND

21. Plaintiff demands trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff seeks judgment in Plaintiff's favor and damages against the Defendant, based on the following requested relief:

- (a) Actual damages;
- (b) Statutory damages;
- (c) Punitive damages;
- (d) Costs and reasonable attorneys' fees; and
- (e) Such other and further relief as may be necessary, just and proper.

Respectfully submitted March 29, 2019.

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